## AMERITECH ILLINOIS' 271 CHECKLIST FILING DISCUSSION DRAFT

Rather than making a "last-minute" filing when the KPMG Final OSS Test Report is released, Ameritech Illinois intends to make a Mid-September filing to document its compliance with Section 271(c), subject to the successful completion of OSS testing and the filing of actual performance results. The later issues will be addressed upon completion of the test. This September informational filing will consist of a draft Section 271 application and supporting draft affidavits, in substantially the same form that Ameritech Illinois intends to file with the FCC when it seeks Section 271 approval. The September filing will include:

# Draft Section 271 Application: Demonstration of prima facie case and supporting affidavits addressing the following issues:

#### **Illinois Story**

• Strawman – Illinois Regulatory: Documents progress made from early 2000 to date: OSS test, Plan of Record, compliance with statutes, rules, orders addressing UNEs, UNE-P, Performance Measurements, Remedy Plan, Market Conditions, technical conferences and work sessions.

#### Track A

• **Heritage** – **Track** A: Demonstrates compliance with Sec. 271(c)(1)(A), focuses on CLECs, how and where they operate in Illinois and market segments in which they are competing.

# **OSS and CLEC Support**

- Thompson Account Management, CLEC Training, and CLEC OnLine:

  Demonstrates some of the support functions Ameritech Illinois makes available to its local wholesale customers, including a comprehensive 'customer-friendly' manual for all aspects of resale, interconnection, UNE provisioning, and OSS.
- Cottrell OSS: Demonstrates enhancements to operations support systems.
- **Brown LSC/LOC**: Addresses various Illinois POR and A-AA issues.
- **Foster DS1 Provisioning**: How Ameritech Illinois provisions, maintains and repairs high capacity telecommunications services for CLECs.
- **Kagan Billing**: Demonstrates how Ameritech Illinois provides nondiscriminatory access to billing in accordance with FCC requirements.

## Major Checklist Items (1, 2, 4, 5, 6, 10, 13, 14)

• Alexander – Wholesale Policy: Pricing and wholesale product checklist items: interconnection, access to network elements, local loop transmission, access to call related databases and signaling, reciprocal compensation, resale.

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- **Deere Network**: Demonstrates that Ameritech Illinois allows non-discriminatory access to its network and offers all network-related checklist items.
- **Silver Advanced Services**: Demonstrates compliance with UNE Remand Order as they relate to advanced services and the Line Sharing Order.
- **Florence Cost Studies**: Describes how Ameritech Illinois developed forward-looking costs in support of its interconnection, UNE and reciprocal compensation offerings, and how these studies comply.

## Other Checklist Items (3, 7, 8, 9, 11, 12)

- Stanek Poles, Ducts and Rights of Way: Demonstrates how Ameritech Illinois provides nondiscriminatory access to the poles, ducts, conduits, and rights-of-way owned or controlled by Ameritech Illinois at just and reasonable rates.
- **Harrison 911**: Demonstrates how Ameritech Illinois provides nondiscriminatory access to 9-1-1 and E9-1-1.
- Rogers OS/DA: Demonstrates how Ameritech Illinois meets its obligations under Section 251 by providing nondiscriminatory access to: OS, DA, DA Listings and direct access to the DA database.
- Kniffen-Rusu White Pages: Demonstrates that Ameritech Illinois satisfies the
  requirement to provide white pages directory listings for customers of the other carrier's
  telephone exchange service.
- Mondon Local Number Portability and Number Administration: Describes steps taken to implement Number Portability and actions taken to comply with the Number Administration requirements.

#### **Performance Measurements**

• **Fioretti – Performance Measurements and Remedy Plan**: Describes performance measurements and standards that Ameritech Illinois has implemented to demonstrate its ongoing checklist compliance and summarize Remedy Plan.

# **Affiliated Advanced Services Subsidiary**

Habeeb – ASI/AADS: Structural separation of retail advanced services; shows that ASI
is operational and utilizing the same Ameritech Illinois processes as are available to, and
being used by, unaffiliated CLECs to order unbundled loops for non-DSL advanced
services.

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